

# Kramer Levin



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January 17, 2025

**Via ECF**

Hon. Renée Marie Bumb  
Chief United States District Judge  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

Re: *In re Toronto-Dominion Bank/First Horizon Corp. Sec. Litig.*  
No. 1:23-cv-02763-RMB-AMD

Dear Chief Judge Bumb:

We write on behalf of the First Horizon Defendants in connection with the Joint Stipulation and Order entered on November 5, 2024 (the “Order”). ECF No. 62.

Pursuant to the schedule set forth in the Order, the First Horizon Defendants advised Lead Plaintiffs that they consent to the filing of the proposed third amended complaint. Although that latest amendment still does not state any viable claims against the First Horizon Defendants for multiple reasons, we believe it would be more efficient to litigate those issues in the context of new motions to dismiss. The First Horizon Defendants will work with the other parties to negotiate a proposed briefing schedule for those motions and to submit the proposed schedule to the Court on January 31, 2025.

We thank the Court for its time and attention to this matter, and are available to discuss these issues at the Court’s convenience.

Respectfully Submitted,

/s/ Norman C. Simon  
Norman C. Simon

cc: All counsel of record via ECF